

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 05-CR-10164-GAO

GUILLERMO FREDERICO VASCO

JOINT MOTION FOR EXCLUDABLE DELAY
FOR THE PERIOD DECEMBER 14, 2005, THROUGH JANUARY 20, 2006

The parties respectfully request the Court to exclude the period of December 14, 2005 through January 20, 2006, under the Speedy Trial Act and state the following in support of this request:

1. The defendant was arraigned on the superseding indictment in this case on December 14, 2005. At the same time, a further status conference was held. The government reported that it expected to complete copying the materials taken from the defendant's cell by Friday, December 16, 2005, and to deliver those materials to defense counsel on that date.
2. Defense counsel advised the Court that he needed time to have certain of the materials translated from Spanish to English and would need his client's assistance to do so. The Court scheduled a further status conference for January 20, 2006, and defense counsel orally agreed that the time until the next status conference should be excluded.

WHEREFORE, the parties request that the period of December 14, 2005, through January 20, 2006, be excluded in that the ends of justice served by doing so outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

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Dated: 1/3/06